

Alexander W. Moore
Assistant General Counsel



185 Franklin Street, 13th Floor
Boston, MA 02110-1585

Phone 617 743-2265
Fax 617 737-0648
alexander.w.moore@verizon.com

October 4, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 04-33 - Petition of Verizon New England Inc. for Arbitration

Dear Ms. Cottrell:

Enclosed is a Joint Motion for Further Extension of Time that is being filed on behalf of Verizon New England Inc., AT&T Communications of New England, Inc., the Competitive Carrier Coalition, the Competitive Carrier Group, and Conversent Communications of Massachusetts, Inc.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Moore".

Alexander W. Moore

cc: Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Petition of Verizon New England Inc. for)
Arbitration of an Amendment to Interconnection)
Agreements with Competitive Local Exchange)
Carriers and Commercial Mobile Radio Service) D.T.E. 04-33
Providers in Massachusetts Pursuant to Section)
252 of the Communications Act of 1934, as)
Amended, and the *Triennial Review Order*)

JOINT MOTION FOR FURTHER EXTENSION OF TIME

Verizon New England Inc., d/b/a Verizon Massachusetts, AT&T Communications of New England, Inc. (and TCG Massachusetts), the Competitive Carrier Coalition,¹ the Competitive Carrier Group,² and Conversent Communications of Massachusetts, Inc. (the “Parties”) hereby respectfully request that the Massachusetts Department of Telecommunications and Energy (the “Department”) grant a further extension of time, until October 7, 2005, to file a conforming Amendment incorporating the determinations made in the Arbitration Order issued by the Department on July 14, 2005 in the above-captioned proceeding.³

¹ The Competitive Carrier Coalition includes: CTC Communications Corp.; DSLNet Communications, LLC; Focal Communications Corporation of Massachusetts, Lightship Telecom, LLC; RCN-BecoCom LLC; and RCN Telecom Services of Massachusetts, Inc.

² The Competitive Carrier Group includes: A.R.C. Networks Inc. d/b/a InfoHighway Communications Corporation; Broadview Networks Inc. and Broadview NP Acquisition Corp.; Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp.; DIECA Communications Inc. d/b/a Covad Communications Company; DSCI Corp., IDT America Corp.; KMC Telecom V, Inc.; and XO Communications Services, Inc. (formerly XO Massachusetts, Inc. and Allegiance Telecom of Massachusetts, Inc.).

³ Arbitration Order in D.T.E. 04-33 (rel. Jul. 14, 2005).

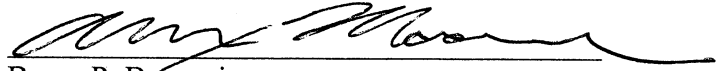
Good cause exists for granting this extension.⁴ Under the terms of the Arbitration Order, which directed the Parties to file a final Amendment within 30 days of its issuance, a conforming Amendment was due on August 15, 2005. The Department subsequently granted the Parties extensions to October 5 to file an Amendment. The Parties have engaged in substantial negotiations and have reached tentative agreement on many issues and contract provisions. The parties requires the short, 2-day extension sought herein so that terms tentatively agreed upon in negotiations can be reviewed internally in the companies and contract language can be made final. In addition, the parties will continue to negotiate during the extension (and beyond as may be necessary and productive) in order to narrow the remaining issues to the extent possible. The Parties have already scheduled additional negotiation sessions for this purpose. Thus, granting the extension requested herein will enable the parties to present to the Department a single compliance amendment that definitively addresses those issues on which the parties have reached agreement and may allow the parties to narrow even further the issues the Department may ultimately have to resolve.

This short extension is therefore in the best interest of all concerned, as it more efficiently achieves the Department's objective of having a conforming Amendment.

⁴ 220 C.M.R. ¶ 1.02(5) (For good cause shown, the Department or the hearing officer has discretion to extend time limits prescribed or allowed by its Procedural Rules).

WHEREFORE, the Parties respectfully request that the Department grant this Joint Motion for Further Extension of Time and find that good cause exists for doing so.

Respectfully submitted,



Bruce P. Beausejour
Alexander W. Moore
Verizon New England, Inc.
185 Franklin Street, 13th Floor
Boston, Massachusetts 02110-1585
(617) 743-2265

Jay E. Gruber
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
99 Bedford Street, Fourth Floor
Boston, Massachusetts 02111
(617) 574-3149 (telephone)

Russell M. Blau
Paul B. Hudson
Philip J. Macres
SWIDLER BERLIN LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500 (telephone)

Counsel to the Competitive Carrier Coalition

Genevieve Morelli
Brett Heather Freedson
KELLEY DRYE & WARREN LLP
1200 Nineteenth Street, N.W., Suite 500
Washington, D.C. 20036
(202) 955-9600 (telephone)

Counsel to the Competitive Carrier Group

Gregory M. Kennan
Conversent Communications of Massachusetts, Inc.
24 Albion Road, Suite 230
Lincoln, RI 02865
Phone: 401-834-3326

Dated: October 4, 2005

D.T.E. 04-33 SERVICE LIST

Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Tina W. Chin, Hearing Officer
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Michael Isenberg, Director
Telecommunications Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

April Mulqueen, Assistant Director
Telecommunications Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Paula Foley, Assistant General Counsel
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Berhane Adhanom, Analyst,
Telecommunications Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Stella Finn, Analyst,
Telecommunications Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Debra Alexander, Analyst,
Telecommunications Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Ashish Shrestha, Analyst
Telecommunications Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Jesse Reyes, Esquire
Department of Telecom & Energy
One South Station, Fl. 2
Boston, MA 02110

Jay E. Gruber, Esquire
Harry Davidow, Esquire
Michelle Consalvo, Esquire
AT&T Communications of New England, Inc.
99 Bedford Street, 4th Floor
Boston, MA 02111

Kenneth W. Salinger
Ruth T. Dowling
Palmer and Dodge LLP
111 Huntington Avenue
Boston, MA 02199

D.T.E. 04-33 SERVICE LIST

Gregory Hoffman
AT&T
32 Avenue of the Americas
New York, NY 10013

Brian Kelleher
AT&T
14 Mark Lane
New City, NY 10956

Russell M. Blau, Esquire
Michael W. Fleming, Esquire
Philip J. Macres, Esquire
Swidler Berlin Shereff Friedman, LLP
The Washington Harbour
3000 K Street, NW, Suite 300
Washington, DC 20007-5116

Andrew Klein, Esquire
Piper Rudnick LLP
1200 Nineteenth Street, NW - Suite 700
Washington, D.C. 20036-2412

E. Barlow Keener
BrahmaCom, Inc.
32 Wexford Street
Needham, MA 02494

Kristin L. Smith, Esquire
Qwest Communications Corp.
1801 California Street, 10th Floor
Denver, CO 80202

Andoni Economou
Leo Maese
Metropolitan Telecommunications of MA, Inc.
44 Wall Street, 6th Floor
New York, NY 10005

Karlen J. Reed, Assistant Attorney General
Utilities Division
Office of the Attorney General
One Ashburton Place, Rm. 1801
Boston, MA 02108-1502

Karen R. Sistrunk, Senior Attorney
Sprint Communications Company L.P.
401 9th Street, NW, Suite 400
Washington, DC 20004

Genevieve Morelli, Esquire
Brett H. Freedson, Esquire
Kelly Drye & Warren LLP
1200 19th Street, NW, Suite 500
Washington, DC 20036

Richard C. Fipphen Senior Counsel
Law and Public Policy
MCI
560 Lexington Avenue, Fl. 7
New York, NY 10022-6946

Scott Sawyer, Esquire
Gregory M. Kennan, Esquire
Conversent Communications of Massachusetts
24 Albion Road – Suite 230
Lincoln, RI 02865

Lance JM Steinhart
Law Office of Lance JM Steinhart PC
1720 Windward Concourse, Suite 250
Alpharetta, GA 30005

D.T.E. 04-33 SERVICE LIST

Jodi J. Caro, Vice President and General Counsel
Looking Glass Networks, Inc.
111 West 22nd Street, Suite 600
Oak Brook, IL 60523

Jennifer Hassen
Benjamin P. Thayer
Freedom Ring Communications, LLC
359 Corporate Drive
Portsmouth, NH 03801

Ken Duarte, Director
Carrier Relations and Regulatory Affairs
Volo Communications of Massachusetts, Inc.
151 S. Wymore Road., Suite 3000
Altamonte Springs, FL 32714-4254

Kevin J. Donohue
A.R.C. Networks
175 Pinelawn Road, Suite 408
Melville, NY 11747

Chris Van de Verg, General Counsel
CoreTel Massachusetts, Inc.
209 West Street, Suite 302
Annapolis, MD 21401

Peter Karoczkai, Senior Vice President
Paola M. Bulloch, Director - Regulatory Affairs
A.R.C. Networks Inc.
1333 Broadway, Suite 1001
New York, NY 10018

Rebecca Sommi, Vice President Operations Support
Broadview Networks Inc./Broadview NP Acquisition
400 Horsham Road
Horsham, PA 19044-2190

Bob Oberlin
Billseye Telecom Inc.
25900 Greenfield Road, Suite 330
Oak Park, MI 48237-1267

Kevin Photiades Regulatory & Compliance Manager
United Systems Access Telecom, Inc.
5 Bragdon Lane, Suite 200
Kennebunk, ME 04043-7262

Christa M. Proper, Vice President
Richmond Connections Inc. d/b/a Richmond NetWorx
124 Fenn Street
Pittsfield, MA 01201

Beth Choroser
Comcast Cable Communications
1500 Market Street
Philadelphia, PA 19102

Anthony Hansel, Senior Counsel
DIECA Communications d/b/a Covad Communication
600 14th Street, NW, Suite 750
Washington, DC 20005

Sean Dandley, President and CEO
DSCI Corporation
1050 Waltham Street, Suite 510
Lexington, MA

Michael J. Shortley, III
1080 Pittsford-Victor Road
Pittsford, NY 14534

D.T.E. 04-33 SERVICE LIST

Scott Kellogg
Essex Acquisition Corp.
180 North Wacker Drive, Suite 3
Chicago, IL 60606

Carl Wolf Billek
Andrew D. Fisher
IDT America Corp.
520 Broad street
Newark, NJ 07102-3111

Marva Brown Johnson, Senior Counsel
Chad Pifer, Regulatory Counsel
KMC Telecom Inc.
1755 North Brown Road
Lawrenceville, GA 30043

Lisa Evans
SpectroTel, Inc.
655 Shrewsbury Avenue
Shrewsbury, NJ 07702

Rex Knowles, Vice President, Regulatory
XO Communications
111 E. Broadway, Suite 1000
Salt Lake City, UT 84111

Doug Kinkoph
Vice President, Regulatory & External Affairs
XO Communications Inc.
Two Easton Oval, Suite 300
Columbus, OH 43219

Francie McComb, Associate General Counsel
Talk America, Inc.
6805 Route 202
New Hope, PA 18938

Michael J. Goldey
PAETEC Communications
81 Highfield Road
Harrison, NY 10528

Dave Berndt, Director of Regulatory Affairs
Lightship Telecom
One Executive Park Drive
Bedford, NJ 03110

Karen M. Potkul, Esquire
XO Communications, Inc.
1601 Trapelo Road, Suite 397
Waltham, MA 02451

Eric J. Krathwohl, Esquire
Rich, May, P.C.
176 Federal Street, 6th Floor
Boston, MA 02110

Douglas S. Denny-Brown, General Counsel
RNK Inc. d/b/a RNK Telecom
333 Elm Street, Suite 310
Dedham, MA 02026